

Jessica L. Margolis (JM-7786)
 jlmargolis@wsgr.com
 WILSON SONSINI GOODRICH & ROSATI, P.C.
 1301 Avenue of the Americas, 40th Floor
 New York, New York 10019-6022
 Phone: 212.999.5800
 Fax: 212.999.5899

M. Craig Tyler*
 ctyler@wsgr.com
 Jose C. Villarreal*
 jvillarreal@wsgr.com
 WILSON SONSINI GOODRICH & ROSATI, P.C.
 8911 Capital of Texas Highway North
 Westech 360, Suite 3350
 Austin, Texas 78759-8497
 Phone: 512.338.5400
 Fax: 512.338.5499

*(admitted *pro hac vice*)

*Attorneys for Defendant/Counterclaim-Plaintiff
 Vignette Corporation*

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

MILLENNIUM, L.P.,)	CASE NO.: 07-CV-4800 (BSJ)
)	
Plaintiff/Counterclaim-Defendant,)	ECF Case
)	
v.)	DEFENDANT AND
)	COUNTERCLAIM PLAINTIFF
VIGNETTE CORPORATION)	VIGNETTE CORPORATION'S
)	INITIAL DISCLOSURES PURSUANT
Defendant/Counterclaim-Plaintiff.)	TO FEDERAL RULE OF CIVIL
)	PROCEDURE 26(a)(1)

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, plaintiff Vignette Corporation ("Vignette") hereby makes the following initial disclosures in this litigation with defendant Millennium, L.P. ("Millennium"). Vignette makes these disclosures without prejudice to its right to serve supplemental disclosures if additional responsive information becomes available, or to correct or modify any information set forth or referenced herein.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT VIGNETTE MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES

Vignette currently believes that the following individuals are likely to have discoverable information that Vignette may use to support its claims and defenses:

Name and, If Known, Address and Telephone Number	Subject of Information
John MacLean c/o Wilson Sonsini Goodrich & Rosati 8911 Capital of Texas Highway Suite 3350 Austin, TX, 78759 512.338.5400	Design, operation and function of Vignette products and knowledge of prior art.
Robert Lech Address and Telephone number unknown	Conception, reduction to practice and subject matter claimed in the asserted patents and U.S. Patent No. 6,683,697.
Mitchell A. Medina Address and Telephone number unknown	Conception, reduction to practice and subject matter claimed in the asserted patents and U.S. Patent No. 6,683,697.
Catherine B. Elias Address and Telephone number unknown	Conception, reduction to practice and subject matter claimed in the asserted patents and U.S. Patent No. 6,683,697.
David A. Blumenthal Foley & Lardner 3000 K Street, N.W. Suite 500 Washington D.C. 20007-5109 202.672.5300	Prosecution of the asserted patents and U.S. Patent No. 6,683,697.
Thomas G. Bilodeau Foley & Lardner 3000 K Street, N.W. Suite 500 Washington D.C. 20007-5109 202.672.5300	Prosecution of U.S. Patent No. 6,683,697.

Name and, If Known, Address and Telephone Number	Subject of Information
Irvin C. Harrington, III Digital Theater Systems, Inc. 5171 Clareton Drive Agoura Hills, CA 91301 818.706.3525	Prosecution of U.S. Patent No. 6,683,697.
Glenn Law Foley & Lardner 3000 K Street, N.W. Suite 500 Washington D.C. 20007-5109 202.672.5426	Prosecution of the asserted patents.
Todd J. Burns Johnson & Johnson One Johnson & Johnson Plaza, Room WH5134 New Brunswick, NJ 08933 732.524.1496	Prosecution of the asserted patents.
Phillip J. Articola Foley & Lardner 3000 K Street, N.W. Suite 500 Washington D.C. 20007-5109 202.672.5300	Prosecution of the asserted patents.
Robert W. Busby Morgan, Lewis & Brockius, LLP 1111 Pennsylvania Avenue, N.W. Washington D.C. 20004 202.739.3000	Prosecution of the asserted patents.
Frederick D. Kim Patterson & Sheridan, LLP 350 Cambridge Avenue Suite 250 Palo Alto, CA 94306 650.330.2310	Prosecution of the asserted patents.

Name and, If Known, Address and Telephone Number	Subject of Information
Greg Miller Miller 7 Heib 2390 Crenshaw Boulevard Suite 250 Torrance, CA 90501 310.994.4496	Prosecution of the asserted patents.
Beth A. Burrous Foley & Lardner 3000 K Street N.W. Suite 500 Washington, D.C. 20007 202.672.5475	Prosecution of the asserted patents.
Lyle K. Kimms Rossi, Kimms & McDowell LLP 20609 Gordon Park Square Suite 150 Ashburn, VA 20147 703.726.6020	Prosecution of the asserted patents.
Scott J. Anchell Drinker, Biddle & Reath, LLP 1500 K Street, N.W. Suite 1100 Washington D.C. 20005-1209 202.842.8800	Prosecution of the asserted patents.
Ronald T. Coslick 2230 E. Imperial Highway El Segundo, CA 90245 310.975.7964	Prosecution of the asserted patents.
C.A. Plesums Address and Telephone number unknown	Knowledge of prior art.
R.W. Bartels Address and Telephone number unknown	Knowledge of prior art.
Kazumasa Fueki Address and Telephone number unknown	Knowledge of prior art.

Name and, If Known, Address and Telephone Number	Subject of Information
Horst Froessl Address and Telephone number unknown	Knowledge of prior art.
Elena M. Zamora Address and Telephone number unknown	Knowledge of prior art.
John Gilbert Axford Address and Telephone number unknown	Knowledge of prior art.
David Michael Youmans Address and Telephone number unknown	Knowledge of prior art.

Because its investigation is ongoing, Vignette expressly reserves the right to supplement this disclosure pursuant to Fed. R. Civ P. 26(e) as its investigation continues.

II. DOCUMENTS THAT VIGNETTE MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES

Pursuant to Fed. R. Civ. P. 26(a)(1)(B), Vignette may use any of the documents produced by Vignette, Millennium, or any third parties in this litigation. Vignette expressly reserves the right to supplement this disclosure pursuant to Fed. R. Civ. P. 26(e) as its investigation continues.

In addition to the foregoing, Vignette submits by category, without limitation, the following description of documents that it may use to support its claims or defenses:

Documents concerning the invalidity of the asserted patents from Vignette Corporation at 1301 South MoPac Expressway, Suite 100, Austin, Texas 78746.

Documents concerning the non-infringement of the asserted patents from Vignette Corporation at 1301 South MoPac Expressway, Suite 100, Austin, Texas 78746.

III. COMPUTATION OF DAMAGES

Vignette is currently seeking its costs of suit, including reasonable attorneys' fees. Vignette continues to investigate the amount and nature of damages to which it may be entitled. Vignette

expressly reserves the right to supplement this disclosure pursuant to Fed. R. Civ. P. 26(e) as its investigation continues.

IV. INSURANCE AGREEMENTS

Vignette is currently unaware of any insurance agreements under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment, which may be entered in the action or to indemnify or reimburse for payments made to satisfy such a judgment.

Dated: October 17, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/

Jessica L. Margolis (JM-7786)

jmargolis@wsgr.com

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